

JAP:ACG

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. § 952(a) and 960)

YSABEL BETANCES DE GORDIAN,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

GREGORY STEMKOWSKI, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

On or about October 27, 2016, within the Eastern District of New York and elsewhere, the defendant YSABEL BETANCES DE GORDIAN did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and belief are as follows:¹

1. On or about October 27, 2016, the defendant YSABEL BETANCES DE GORDIAN arrived at JFK International Airport in Queens, New York aboard JetBlue Flight 410 from Santo Domingo, Dominican Republic.

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.


2. Upon her arrival, the defendant was selected for an enforcement examination by United States Customs and Border Protection ("CBP") officers.² The defendant presented a checked bag and a purse. The defendant claimed ownership over both bags.

3. During the examination of the defendant's baggage, CBP officers discovered that the purse had unusually thick sides and bottom. CBP officers cut open the purse from its seams, which revealed three packages containing a white powdery substance. The packages were field tested and returned a positive result for the presence of cocaine.

4. The total approximate gross weight of the cocaine recovered from the defendant's purse was 2.286 kilograms.

WHEREFORE, your deponent respectfully requests that the defendant YSABEL BETANCES DE GORDIAN be dealt with according to law.

Dated: Brooklyn, New York
October 28, 2016



GREGORY STEMKOWSKI
Special Agent
United States Department of Homeland Security
Homeland Security Investigations

~~Sworn to before me this~~
~~28th day of October, 2016~~

THE HONORABLE STEVEN M. GOLD
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

² Prior to the defendant being selected for an enforcement examination, a CBP canine, trained in detecting narcotics, alerted to the defendant.